#### Michael H. Juba

Director Product Safety & Occupational Health



December 12, 2011

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Pittsburgh, PA 15219-1800
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Koppers Inc.

Moana Appleyard
Chemical Review Manager
Risk management and Implementation Branch 5
Pesticide Re-Evaluation Division 7508P
Office of Pesticide Programs
US Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Product Specific Data Call-In Notice for Coal Tar Creosote Case 0139

Dear Ms. Appleyard:

Enclosed with this letter is Koppers 90-Day response to the Product Specific Data Call-In Notice received on September 26, 2011. Koppers Inc. is a member of Creosote Council III, EPA Joint Data Consortium and EPA Company Number 63700. This letter addresses the product specific response for Koppers creosote registrations (61468-1, 61468-3, 61468-6 and 61468-9) and consists of:

- 1) EPA Data call-In Response Form.
- 2) Requirements Status and Registrant's Response Form.
- 3) Product Specific Response Table 1, DCI Response Rationale.
- 4) Confidential Statement of Formula for each registered creosote product.

Please address any questions about this response to the undersigned.

Sincerely

/lichael H. Juba

cc: John H. Butala, Creosote Council III Lawrence S. Ebner, Creosote Council Mark A. Harman, EPA

Jacqueline Campbell-McFarlane, EPA

Enclosure(s)

82/10/12

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N.A. N.A. Y 25 N.A. N.A. Y 25			I	DATA CALL-IN	RESPONSE						
KOPPERS INC  436 SEVENTH AVENUE, K-1800 PITTSBURGH, PA 152191800  Coal tar creosote  Coal tar creosote  Data requirements as indicated on the attached form entitled "Requirements on the attached form entitled "Requirements Status and Registrant's Response."  S1468-1  N.A.  N.			se read carefully f	the attached instruction	ons and supply the information request	ted on this f	form.				
Product Registration  Cancel this product registration voluntarily  6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.  6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements on the attached form entitled "Requirements Status and Registrant's Response."  7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  81468-1  81468-3  81468-6  N.A.  N.A.	KOPPERS INC 436 SEVENTH AVENU	UE, K-1800		0139 Coal Tar Chemical # and	nr/Creosote Name 025004	22 PF	22-Sep-2011 PRODUCT SPECIFIC				
Product registration product registration voluntarily  6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.  6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements on the attached form entitled "Requirements Status and Registrant's Response."  7b. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7c. My product is an MUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7c. My product is an MUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7c. My product is an MUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7c. My product is an MUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7c. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."  7c. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	4. LIA			Data		7. Prod	duct Specific Data				
1468-3 1468-6 N.A. N.A. ΥΥ.5 N.A. ΥΥ.5	Registration product registration voluntarily		Data Exem obtain the a from the so	nption because I active ingredient ource EPA regis-	Data requirements as indicated on the attached form entitled "Requirements Status and	I agree require form er Status	I agree to satisfy the MUP requirements on the attached form entitled "Requirements form Status and Registrant's Statu		I agree requirer form en Status	ree to satisfy the EUP uirements on the attached n entitled "Requirements us and Registrant's	
81468-6 N.A. N.A. N.A. V95	61468-1	E ESTABLISHED		N.A.	N.A.		Research to	AT CERTAIN			
81468-6 61468-9 N.A. N.A. N.A. YES	61468-3			N.A.	N.A.				1	Y 25	
N.A. N.A. γ 4.5	61468-6	A BECOME ANDREES	A STREET, A	N.A.	N.A.		Y95		S MAR BURNEY CONTRACTOR		
	61468-9			N.A.	N.A.		ι			γε5	
3. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any chowingly false or misleading statement may be punishable by fine in prisonment or both under applicable law.  Signature and Title of Company's Authorized Representative			- 1/	4 H I . WA II SN 1	re, accurate, and complete. I acknow under applicable law.	vledge that a	any	1. 1	ca han	2011	
To the distribution of the second sec	10. Name of Company			The state of the s	V		-		-		

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## REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

Company Name and	Address	2. Case # and Name					3. Date and Type of DCI a	and Number		
KOPPERS INC 436 SEVENTH AVENUE, K-1800 PITTSBURGH, PA 152191800		0139 Coal Tar/Creo EPA Reg. No. 61468					22-Sep-2011 PRODUCT SPECIFIC ID # PDCI-025004-30247			
Guideline Requirement Number	5. Study Title	6, Uso Pallett	P R O T O C		gress ports	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response	
				1	2 3	1		1		
DATE:	Product Chemistry Data Requiremen	its (Antimicrobial)				Activities of the second	in type heat that says benfaty to			
830.1550	Product Identity and composition	(11)	П			ВВ	EP; MP; TGAI	8	6	
830.1600	Description of materials used to produc	ce the product (10)				BB	EP; MP; TGAI	8		
830.1620	Description of production process	(9)	П			ВВ	TGAI	8	1	
830.1650	Description of formulation process	(8)				ВВ	EP; MP	8		
830.1670	Discussion of formation of impurities	(7)				BB	EP; MP; TGAI	8	1	
830.1700	Preliminary analysis	(6 ,12 ,13)			1	ВВ	TGAI	8	6	
830.1750	Certified limits	(5)			1	BB	EP; MP; TGAI	8		
830.1800	Enforcement analytical method	(4)				BB	EP; MP; TGAI	8	6	
830.6302	Color	(14)				BB	EP; MP; TGAI	8	6	
830.6303	Physical state	(15)	200		7 60	BB	EP; MP; TGAI	8	6	
830.6304	Odor	(16)				ВВ	EP; MP; TGAI	8	6	
	tify that the statements made on this form are ading statement may be punishable by fine, ompany's Authorized Representative	n all attachments are true a	curate	e, an	d comp	lete. I acknowledge t	that any 11. Date	ember 201	1	
12. Name of Company	KOPPAS INC.		-WV			В	13. Phone Number		7-2682	

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#### REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address 2. Case # and Name 3. Date and Type of DCI and Number KOPPERS INC 0139 Coal Tar/Creosote 22-Sep-2011 436 SEVENTH AVENUE, K-1800 PRODUCT SPECIFIC PITTSBURGH, PA 152191800 ID # PDCI-025004-30247 EPA Reg. No. 61468-9 4. Guideline 5. Study Title 6. Use 7. Test 8. Time 9. Registrant **Progress** Requirement Pattern Substance Frame Response Reports Number (Months) 0 0 2 3 830.6313 Stability to normal and elevated temperatures, (3,17,18) BB **TGAI** metals, and metal ions 830.6314 Oxidizing or reducing action (19)BB EP: MP 8 830.6315 Flammability (20)8 BB EP; MP 830.6316 Explodability 8 (21)BB EP: MP Storage stability 830.6317 (58)BB EP: MP 16 6 830.6319 Miscibility (22)8 BB EP; MP 830.6320 Corrosion characteristics (59)BB EP: MP 16 6 8 830.6321 Dielectric breakdown voltage (23)BB EP: MP рН 830.7000 (24, 25)BB EP; MP; TGAI 830.7050 UV/Visible absorption BB PAI: TGAI 830.7100 Viscosity (26)BB EP; MP 6 Melting point/melting range 8 830.7200 (27.28)BB **TGAI** 

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date

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INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

	C HAVENUE, K-1800 , PA 152191800	Case # and Name 0139 Coal Tar/Co EPA Reg. No. 614		e	Stop	oat	Creat Fard Name 9139 Coal Taylo	3. Date and Type of DCI and Number  22-Sep-2011  PRODUCT SPECIFIC  ID # PDCI-025004-30247			
Guideline Requirement Number	5. Study Title		PROTOC		rogres Reports		6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response	
			L O	1	2	3					
830.7220	Boiling point/boiling range	(29,30)					BB	TGAI	8	6	
830.7300	Density/relative density	(31 ,32)					вв	EP; MP; TGAI	8	6	
830.7370	Dissociation constants in water	(33 ,34)					BB	PAI; TGAI	8	8	
830.7550	Partition coefficient (n-octanol/water), shake f	lask (35)		Centralia	П	Series .	вв	PAI; TGAI	8	6	
830.7560	Partition coefficient (n-octanol/water), general	tor (56,57)					BB	TGAI or PAI	8	7	
830.7570	Partition coefficient (n-octanol/water), estimat	ion by (36)			П	-	вв	PAI; TGAI	8	17	
830.7840	Water solubility: Column elution method, shall method	ke flask (37)					BB	PAI; TGAI	8	8	
830.7860	Water solubility, generator column method	(38)	- Linear		П	NO.	вв	PAI; TGAI	8	8	
830.7950	Vapor pressure	(39 ,40)					BB	PAI; TGAI	8	6	
	Toxicology Data Requirements (Antimicrol	bial)					Name In contract of	Commission and Commis		1000	
870.1100	Acute Oral Toxicity	(2 ,41 ,42)	21 23				BB	EP; MP; TGAI	8	6	
870.1200	Acute dermal toxicity	(1 ,43 ,44 ,45)					ВВ	EP; MP; TGAI	8	6	
Initial to indicate certi (full text of certificatio	ification as to information on this page on is on page one).	HX			Ш		1910	Date 19 Dec	cember 20	Yar makin al liak	

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### REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

		2. Case # and Name 0139 Coal Tar/Creos EPA Reg. No. 61468	sote		3. Date and Type of DCI and Number  22-Sep-2011  PRODUCT SPECIFIC  ID # PDCI-025004-30247			
Guideline Requirement Number	5. Study Title	Andrew C	P R Progr O Repo	ess orts 6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response	
			0 L 1 2	3	The Section of the Se		THE DESIGNATION OF THE PARTY OF	
870.1300	Acute inhalation toxicity	(46 ,47 ,48 ,49)		BB	EP; MP; TGAI	8	6	
870.2500	Acute dermal irritation	(50 ,51 ,52 ,53)		ВВ	EP; MP; TGAI	8	16	
870.2600	Skin sensitization	(54 ,55)		BB	EP; MP; TGAI	8	6	
870.2400	Acute eye irritation			ВВ	EP; MP; TGAI	8	6	
	SE MOTORS			. (iii) hall satisf	Committee of the state of	STORES BOOK	2.613	
	8 IAST (A9			(88) b	lity, gaseottor column mather	defas age\VI	17880	
	1007740			(04, (6)		SCHOOL SHOW	Sass Cass C	
				Cleidona	Data Remillements (amina	vanto losT		
ma le	ANY SWEET			Ent Burk, Street, Comme	- The state of the	Ten O Mark	0077.0	
	EP: MP: TGAL B			(60, 1) (60,	of Lendonly	Acute com	0007.0	
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